IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS

ANANDA CAMARGO CHAVEZ,   §
   Plaintiff,   §
                                                     §
v.   §
                                                     §   Case No. 1:24-cv-504-RP
REBUILT BROKERAGE LLC d/b/a   §
REBUILT REALTY AND REBUILT   §
OFFERS LLC   §
   Defendants.   §

_____/

**DECLARATION OF ANDREW PERRONG IN
SUPPORT OF PLAINTIFF'S MOTION FOR CLASS CERTIFICATION**

I, Andrew R. Perrong, declare under penalty of perjury:

1.   I make this declaration in support of Plaintiff's Motion for Class Certification. Except as otherwise noted, I have personal knowledge of the facts set forth in this declaration and could testify competently to them if called upon to do so.

2.   I am an attorney duly admitted to practice in the Commonwealth of Pennsylvania and the State of Oregon, I am over 18 years of age, and I am competent to testify and make this affidavit on personal knowledge. I have extensive experience in the prosecution of class actions on behalf of consumers, particularly claims under the TCPA.

3.   Prior to law school, I was a named plaintiff in TCPA class actions, including two class actions that resulted in certified classwide settlements, including *Perrong v. Orbit Energy & Power*, cited in Mr. Paronich's Declaration.

4.   I am a 2023 graduate of Temple University Law School. In 2023, I was admitted to the Bar in Pennsylvania. Since then, I have been admitted to practice before all the Federal District Courts in Texas, the Eastern and Middle Districts of Pennsylvania, and the District of

Oregon, among others. I have also been admitted to practice before the Second and Third Circuit

Courts of Appeal, for which I have successfully defended appeals in TCPA class actions. From

time to time, I have appeared in other State and Federal District Courts *pro hac vice*. I am in

good standing in every court to which I am admitted to practice.

5.   In 2023, I started Perrong Law, LLC, focused on protecting consumers in class

action lawsuits.

6.   Thus far, I have been appointed class counsel in *Aley v. Lightfire Partners, LLC*,

No. 5:22-CV-00330 (AMN/TWD), (N.D.N.Y.), another certified TCPA class action against

which I also successfully defended a petition for interlocutory appeal as appellee.

7.   I have extensive experience using the statistical analysis software SPSS to

conduct data analysis.

8.   Originally released by IBM in 1968, SPSS is a widely-used and powerful

software program for running multivariate statistical analysis. It is used especially in the social

sciences and in advertising and marketing, and is relied upon by multiple government agencies,

and is well received in those industries because it is simple, powerful, and accurate.

9.   Perrong Law LLC maintains access to the National Do Not Call Registry through

Subscription Account Number 1040XXXX-50XXXX-24.

10.   As part of this litigation and for the purposes of class certification, I analyzed the

data MessageMedia produced in response to a subpoena to ascertain which numbers, if any, were

listed on the National Do Not Call Registry.

11.   I understand that these files include a list of individuals whom Defendants

contacted via telemarketing text message between approximately January 2023 to present.

12.   I also analyzed the data to ascertain which numbers, if any, received messages after texting "stop."

13.   After conducting a rudimentary analysis using SPSS, I obtained data and number counts substantially identical to those that Mr. Woolfson has identified in his proposed expert report, attached herein as an exhibit.

14.   As such, I can confidently state that, even if Mr. Woolfson is not designated as an expert in this matter, the Plaintiff will be able, and intends to, designate a summary witness to testify to the summary of this data, as permitted under Rules 1006 and 701 of the FEDERAL RULES OF EVIDENCE.

15.   Although technically-oriented, this compilation and summarization of data does not require scientific, technical, or otherwise specialized knowledge. Any individual possessing an adequate knowledge of computing, together with the appropriate data and tools, can conduct this summary, including a summary at trial.

        PURSUANT TO 28 U.S.C. § 1746, I DECLARE SIGNED UNDER PENALTY OF PERJURY OF THE UNITED STATES OF AMERICA THAT THE FOREGOING IS TRUE AND CORRECT EXECUTED THIS 20TH DAY OF MARCH 2025 IN THE COMMONWEALTH OF PENNSYLVANIA.

                        /s/ Andrew R. Perrong
                        Andrew R. Perrong